

## **Exhibit 39**

Excerpts of deposition of Lucien Greaves  
(November 6, 2023)

**In the Matter Of:**

**SATANIC TEMPLE vs NEWSWEEK DIGITAL**

1:22-cv-01343-MKV

---

**LUCIEN GREAVES**

*November 06, 2023*

---



**ESQUIRE**  
DEPOSITION SOLUTIONS

800.211.DEPO (3376)  
*EsquireSolutions.com*

LUCIEN GREAVES  
SATANIC TEMPLE vs NEWSWEEK DIGITAL

November 06, 2023

1

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 THE SATANIC TEMPLE, INC.,

5 Plaintiff,

6 -against-

Case No.

1:22-cv-01343-MKV

7 NEWSWEEK DIGITAL, LLC,

8 Defendant.

9 -----x  
10 November 6, 2023  
11 9:32 a.m.

12  
13 Deposition of LUCIEN GREAVES, taken by  
14 Defendant, held at 30 Rockefeller Plaza, New  
15 York, New York, before Joseph R. Danyo, a  
16 Shorthand Reporter and Notary Public within  
17 and for the State of New York.  
18  
19  
20  
21  
22  
23  
24  
25

LUCIEN GREAVES  
SATANIC TEMPLE vs NEWSWEEK DIGITAL

November 06, 2023

2

A P P E A R A N C E S :

KEZHAYA LAW PLC  
Attorneys for Plaintiff and the Witness  
150 S. Fifth Street  
Suite 1850  
Minneapolis, Minnesota 55401

By: MATT KEZHAYA, ESQ.  
SONIA KEZHAYA, ESQ.

LAW OFFICES OF CAMERON STRACHER PLLC  
Attorneys for Defendant  
51 Astor Place  
9th Floor  
New York, New York 10003

By: CAMERON STRACHER, ESQ.  
SARA TESORIERO, ESQ. (Via Zoom)

Also Present:

LAURA HENRIQUE, ESQ., Newsweek (Via Zoom)

~oOo~

LUCIEN GREAVES  
SATANIC TEMPLE vs NEWSWEEK DIGITAL

November 06, 2023

3

Greaves

L U C I E N G R E A V E S, having been first  
duly sworn by Joseph R. Danyo, a Notary Public,  
was called as a witness and testified as follows:

EXAMINATION BY MR. STRACHER:

Q. Good morning, Mr. Greaves. My name  
is Cameron Stracher. I am the attorney for  
Newsweek in this lawsuit brought by The Satanic  
Temple against Newsweek, and we're here today to  
take your deposition. Have you ever been deposed  
before?

A. I have.

Q. How many times?

A. I would say around five ,I think.  
Thereabouts.

Q. Were those all in civil lawsuits?

A. Yeah.

Q. And as best as you recall, were you a  
plaintiff or a defendant in those lawsuits?

A. Plaintiff.

Q. So you know then that in a deposition  
I will ask you questions relating to the case,  
and I will ask that you listen carefully and then  
answer the question to the best of your ability.  
Will you do that?

LUCIEN GREAVES  
SATANIC TEMPLE vs NEWSWEEK DIGITAL

November 06, 2023

9

Greaves

introduction to Satanism?

A. I think my initial interest was piqued, I grew up in what they call a Satanic panic, which you may have some awareness of, a sociological phenomenon recognized now as a moral panic, and in the 80's and 90's there was this mythology, rumors of Satanic cults, secretive cults committing all kinds of atrocious acts, and of course that idea didn't appeal to me, do these anti-human cruel acts, but later on I began to wonder why this happened, why were they saying these things on television shows, why were these ridiculous tales being told, and then they suddenly seemed to disappear.

If there was really this huge conspiracy then, there must have been something deeper to it, and I also was growing very skeptical of traditional religion, but I had been taught, and that seemed to be a confluence of when I recognized what people who self-identified as Satanists actually held as a common thread in their thinking as opposed to what was presented, I think seeing the injustice of how that was presented, and this moral panic had a lot to do

LUCIEN GREAVES  
SATANIC TEMPLE vs NEWSWEEK DIGITAL

November 06, 2023

10

1 Greaves

2 with my affinity for it.

3 Q. Where did you grow up?

4 A. Michigan.

5 Q. Which town or city?

6 A. I moved around a bit outside of  
7 Detroit. So Mount Clemens, Sterling Heights,  
8 Detroit, and I mean I rented so many places it's  
9 hard to even be sure I can go through the whole  
10 list.

11 Q. That's okay. I'm just asking  
12 generally. And by the way, if you don't recall  
13 specifically, it's perfectly fine to say you  
14 don't recall.

15 So tell me about leaving Hachette to  
16 be involved with The Satanic Temple. That  
17 occurred in 2017, is that right?

18 A. Probably earlier than that then,  
19 given that I would say that I think I quit  
20 Hachette not long after our Pink Mass, which, you  
21 know, you can find a specific date for news  
22 reports and things like that.

23 Q. At the time you quit Hachette, did  
24 you then take on a paying role with the Satanic  
25 Temple?

LUCIEN GREAVES  
SATANIC TEMPLE vs NEWSWEEK DIGITAL

November 06, 2023

18

Greaves

Q. So the decision to pursue a lawsuit, for example, on behalf of The Satanic Temple, that would be something that would come to you, is that right?

A. Yeah.

Q. The decision to adopt a certain advocacy perspective, that would also come to you?

A. Yeah. Correct.

Q. But a complaint of sexual harassment would not necessarily come to you?

A. That is correct. Yeah.

Q. Or a complaint from a member in a congregation that he or she felt as if they were being sexually abused would not necessarily go to you?

A. Yeah. I know that might sound strange and maybe irresponsible, but after a few years we felt really we should separate ourselves from that, because we feel people try to attack the founders of the organization as a means of attacking the organization, and, like I said, any arbitrary attachment we might have to an issue people can try to exploit to make it seem a



C E R T I F I C A T I O N

I, JOSEPH R. DANYO, a Shorthand Reporter  
and Notary Public, within and for the State of New  
York, do hereby certify:

That I reported the proceedings in the  
within entitled matter, and that the within transcript  
is a true record of such proceedings.

I further certify that I am not related, by  
blood or marriage, to any of the parties in this  
matter and that I am in no way interested in the  
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my  
hand this 12th day of November, 2023.



JOSEPH R. DANYO

STATE OF NEW YORK

My Commission Expires 2/20/2027